

FILED
CLERK

JD:MKP
F. #2016R01314

2016 JUL 12 PM 1:13

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

I N D I C T M E N T

CR 16 - 388

- against -

Cr. No. _____
(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2),
924(d)(1) and 3551 et seq.;
T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

HASSAN CHUNN,
also known as
“Hassan Cabrera,”

Defendant.

COGAN, J.

- - - - -X

MANN. M.J.

THE GRAND JURY CHARGES:

FELON IN POSSESSION OF A FIREARM

1. On or about June 26, 2016, within the Eastern District of New York, the defendant HASSAN CHUNN, also known as “Hassan Cabrera,” having previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: a Bersa .38 caliber Firestorm pistol and ammunition.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant HASSAN CHUNN, also known as “Hassan Cabrera,” that upon his conviction of the above-charged offense, the government will seek forfeiture in accordance with Title 18, United States Code,

Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922(g), or violation of any other criminal law of the United States, including but not limited to one Bersa .38 caliber Firestorm pistol and ammunition, seized on or about June 26, 2016.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON

ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

By:



Assistant U.S. Attorney

F. #2016R01314
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

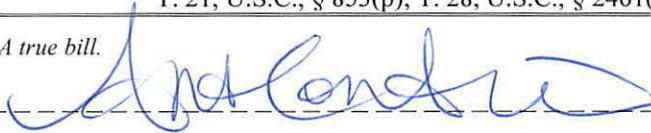
HASSAN CHUNN,
also known as "Hassan Cabrera,"

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2), 924(d)(1) and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Moira Kim Penza, Assistant U.S. Attorney (718) 254-6454